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6 Attorneys for Defendants
7 ABDULLAH LIMITED COMPANY,
BINOTECH LLC, and HIK TECH LLC

IN THE UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

11 JOANNA ARDALAN, ESQ, an
12 individual; ONE LLP, a California Limited
Liability Partnership,

13 || Plaintiffs,

14 | VS.

15 BINOTECH LLC; KAREN MUMMERT;
16 MICHAEL MUMMERT; ABDULLAH
17 LIMITED COMPANY; CODERS CUBE
18 LLC; HIK TECH LLC; DATA PATCH,
INC.; DOE 1, d.b.a. LAW INTEGRAL,
LLC, business entity unknown; DOE 2,
d.b.a. DEPUTY TRADEMARK, business
entity unknown; DOE 3, p.k.a.
19 MCGIELLE SPAGHETTI, business entity unknown

19 MICHELLE SPRAGUE, an individual;
20 DOE 4, d.b.a. TRADEMARK INTEGRAL,
business entity unknown; DOE 5, d.b.a.
21 BRANDREGISTRATION.ORG, business
entity unknown; and DOES 6 through 10,
inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-DFM

**DECLARATION OF DAVID R.
FLYER IN SUPPORT OF
MOTION TO SET ASIDE
DEFAULT OF ABDULLAH
LIMITED COMPANY,
BINOTECH LLC, and HIK TECH
LLC (FRCP 55(c))
[Doc. 50]**

U.S. District Judge:
Kenly Kiya Kato
U.S. Magistrate Judge:
Douglas F. McCormick

Courtroom: 3
3470 12th Street, Riverside,
California 92501
Complaint filed: July 12, 2023
Default taken: October 25, 2024

24 | TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS:

25 || I, David R. Flyer, declare:

26 1. I have personal knowledge of the underlying, by virtue of being an
27 attorney, duly licensed to practice law before all the federal and state courts in

1 California. I am attorney for Defendants ABDULLAH LIMITED COMPANY,
2 BINOTECH LLC, and HIK TECH LLC herein. I could and would competently
3 testify under oath in a court of law to the following if called upon to do so.

4 Attached to this filing at Exhibit "8" is a true and correct copy of the proposed
5 answer to complaint of Defendants ABDULLAH LIMITED COMPANY,
6 BINOTECH LLC, and HIK TECH LLC.

7 I declare, under penalty of perjury under the laws of the United States of
8 America, that the foregoing is true and correct and executed at Newport Beach,
9 California, on November 25, 2024.

10 /s/ David R. Flyer
11 David R. Flyer

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